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Hearing Date and Time: January 9, 2014 at 2:00 p.m. Objections due by: January 2, 2014 at 4:30 p.m.

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Attorneys for Stout Street Fund I, L.P.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

		X	
In re:		:	
HUI JUN WANG,		:	Chapter 13
	Debtor.	:	Case No. 13-13827 (ALG)
	Deotor.	:	
		X	

## NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY NUNC PRO TUNC TO ALLOW FORECLOSURE SALE OF REAL PROPERTY

PLEASE TAKE NOTICE that on January 9, 2014 at 2:00 p.m., or as soon thereafter as counsel may be heard, a hearing shall be held before the Honorable Allan L. Gropper, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, Courtroom #617, New York, New York, 10004, to consider Stout's *Motion for Relief from Automatic Stay Nunc Pro Tunc to Allow Foreclosure Sale of Real Property* (the "Motion") at which time you should appear.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion must (i) be in writing; (ii) state the name and address of the objecting party and nature of the claim or interest of such party; (iii) state with particularity the legal and factual bases of

such objection; (iv) conform to the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules; (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-399 (available at the Court's website, www.nysb.uscourts.gov) by registered users of the Court's Electronic Case Filing System, and by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format no later than January 2, 2014, at 4:30 p.m. (prevailing Eastern Time); (vi) be served on Perkins Coie LLP, 30 Rockefeller Plaza, 22nd Floor, New York, 10112, Attn: Schuyler Carroll, Esq., and (vii) with a courtesy copy to the chambers of the Honorable Allan L. Gropper, United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 617, One Bowling Green, New York, New York 10004 so as to be actually filed and received by no later than January 2, 2014, at 4:30 p.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that if no objection to the Motion is received by January 2, 2014, at 4:30 p.m. (prevailing Eastern Time), the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

[signature page follows]

Dated: New York, New York. December 19, 2013 PERKINS COIE LLP Attorneys for Stout Street Fund I, L.P.

By: <u>/s/ Schuyler G. Carroll</u> Schuyler G. Carroll 30 Rockefeller Center, 22nd Floor New York, NY 10112-0085 212.262.6900